1 2 3	NICHOLAS A. TRUTANICH United States Attorney Nevada Bar Number 13644 JARED L. GRIMMER Assistant United States Attorney	
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6 7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:20-mj-00281-VCF
9	Plaintiff,	Stipulation for an Order Directing Probation to Prepare a Criminal
10	V.	History Report
11	VENANCIO JUAREZ-CESAR, aka VENANCIO JUAREZ-SANTIAGO,	
12 13	aka VENANCIO SANTIAGO, aka VENANCIO JUAREZ, aka CESAR JUAREZ,	
	aka DELPHINO JUAREZ RAMIREZ,	
14 15	Defendant.	
16	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.	
17	Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States	
18	Attorney, counsel for the United States of America, and Wendi Overmyer, Assistant	
19	Federal Public Defender, counsel for Defendant Venancio Juarez-Cesar, that the Court	
20	direct the U.S. Probation Office to prepare a report detailing the defendant's criminal	
21	history.	
22	This stipulation is entered into for the following reasons:	
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1	1. The defendant has elected to review the government's Fast Track offer to	
2	resolve this matter. If he accepts this offer, the parties will jointly request an expedited	
3	sentencing date 45 days from the change of plea.	
4	2. The U.S. Probation Office cannot begin obtaining the defendant's criminal	
5	history until after the defendant enters his guilty plea unless the Court enters an order	
6	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes	
7	of a defendant's initial appearance.	
8	3. The U.S. Probation Office informs the government that it would like to begin	
9	obtaining the defendant's criminal history now so that it can complete the Presentence	
10	Investigation Report by the time of the expected expedited sentencing.	
11	Accordingly, the parties request that the Court enter an order directing the U.S.	
12	Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this 20th day of April, 2020.	
14		Respectfully submitted,
15		NICHOLAS A. TRUTANICH United States Attorney
16	//s//	
17	WENDI OVERMYER	JARED L. GRIMMER
18	Assistant Federal Public Defender Counsel for Defendant VENANCIO JUAREZ-CESAR	Assistant United States Attorney
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1 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 2 3 UNITED STATES OF AMERICA, Case No. 2:20-mj-281-VCF **Order Directing Probation to** 4 Plaintiff, Prepare a Criminal History Report 5 v. VENANCIO JUAREZ-CESAR, 6 aka VENANCIO JUAREZ-SANTIAGO, 7 aka VENANCIO SANTIAGO, aka VENANCIO JUAREZ, 8 aka CESAR JUAREZ, aka DELPHINO JUAREZ RAMIREZ, 9 Defendant. 10 11 Based on the stipulation of counsel, good cause appearing, and the best interest of 12 justice being served: 13 14 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history. 15 DATED this 22nd day of April, 2020. 16 an Backer 17 18 HONORABLE CAM FERENBACH UNITED STATES MAGISTRATE JUDGE 19 20 21 22 23 24